Fill in this information to identify the case:							
Debtor 1	Ashley Irene Small						
Debtor 2 (Spouse, if filing	))						
United States	Bankruptcy Court for the: MIDDLE	District of Pennsylvania (State)					
Case number	19-02055-HWV	- (State)					

### Form 4100R

### **Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Name of creditor:	Freedom Mortgage Corporation		Court claim no. (if known):
_ast 4 digits of any	number you use to identify the debtor's acco	unt: 1730	
Property address:	129 Clearview Road		
	Number Street		
	Aspers, Pennsylvania 17304		
	City State ZIP Code	e	
art 2: Prepetition	n Default Payments		
Check one:			
	s that the debtor(s) have paid in full the amount claim. Creditor asserts that the total prepetition is		· ·
on the creditor's of this response i	claim. Creditor asserts that the total prepetition		
on the creditor's of this response of this response of the credit of the	claim. Creditor asserts that the total prepetition as:  on Mortgage Payment	amount remaining unpaid as of the	date \$
on the creditor's of this response of this response of the creditor's of this response of the creditor's of this response of the creditor's cre	claim. Creditor asserts that the total prepetition as:	amount remaining unpaid as of the payments consistent with § 1322(b	date \$
on the creditor's of this response in the sequence of this response in the sequence of the seq	claim. Creditor asserts that the total prepetition as:  con Mortgage Payment  at the debtor(s) are current with all postpetition	amount remaining unpaid as of the payments consistent with § 1322(b	date \$
on the creditor's of this response of this response of this response of this response of the control of the con	claim. Creditor asserts that the total prepetition as:  on Mortgage Payment  at the debtor(s) are current with all postpetition ode, including all fees, charges, expenses, escr	payments consistent with § 1322(b ow, and costs.  MM / DD / YYYY  on payments consistent with § 1322	)(5) of
on the creditor's of this response of this response of this response of the control of the contr	claim. Creditor asserts that the total prepetition is:  fon Mortgage Payment  at the debtor(s) are current with all postpetition code, including all fees, charges, expenses, escrition payment from the debtor(s) is due on:  at the debtor(s) are not current on all postpetition	payments consistent with § 1322(b ow, and costs.  MM / DD / YYYYY  on payments consistent with § 1322 scrow, and costs.	)(5) of
on the creditor's of this response of this response of this response of this response of the second control of the Bankruptcy of the Bankr	claim. Creditor asserts that the total prepetition is:  con Mortgage Payment  at the debtor(s) are current with all postpetition ode, including all fees, charges, expenses, escrition payment from the debtor(s) is due on:  at the debtor(s) are not current on all postpetition of Code, including all fees, charges, expenses, exp	payments consistent with § 1322(b ow, and costs.  MM / DD / YYYYY  on payments consistent with § 1322 scrow, and costs.	)(5) of
on the creditor's of this response of this response of this response of this response of the second of the Bankruptcy of	claim. Creditor asserts that the total prepetition is:  fon Mortgage Payment  at the debtor(s) are current with all postpetition ode, including all fees, charges, expenses, escrition payment from the debtor(s) is due on:  at the debtor(s) are not current on all postpetition ode, including all fees, charges, expenses, ethat the total amount remaining unpaid as of the	payments consistent with § 1322(b ow, and costs.  MM / DD / YYYYY on payments consistent with § 1322 scrow, and costs.	)(5) of
on the creditor's of this response of this response of this response of this response of the second	claim. Creditor asserts that the total prepetition is:  fon Mortgage Payment  at the debtor(s) are current with all postpetition tode, including all fees, charges, expenses, escrition payment from the debtor(s) is due on:  at the debtor(s) are not current on all postpetition of Code, including all fees, charges, expenses, ethat the total amount remaining unpaid as of the tion ongoing payments due:  arges, expenses, escrow, and costs outstanding	payments consistent with § 1322(b ow, and costs.  MM / DD / YYYYY on payments consistent with § 1322 scrow, and costs.  date of this response is:	)(5) of (a) \$ \( \frac{0.00}{2} \)

Ashley Irene Small Debtor 1

Middle Name Last Name

19-02055-HWV Case number (if known)

#### Part 4:

#### **Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

#### Part 5:

#### Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

☐ I am the creditor.

☑ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

	11/22/23
/s/ Andrew M. Lubin	

Print

Andrew M. Lubin

Attorney for creditor First Name Middle Name

McCabe, Weisberg & Conway, LLC Company

If different from the notice address listed on the proof of claim to which this response applies:

1420 Walnut Street, Suite 1501 Address

Number

Philadelphia, PA 19102 ZIP Code City

ecfmail@mwc-law.com Contact phone (215) 790 - 1010

Desc

## UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: Ashley Irene Small

Debtor(s)

Freedom Mortgage Corporation, or its Successor

or Assignee

**Movant** 

VS.

Ashley Irene Small Jack N Zaharopoulos

Respondent(s)

Chapter 13

Bankruptcy No. 19-02055-HWV

# <u>CERTIFICATION OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT</u>

I, Andrew M. Lubin, attorney for Freedom Mortgage Corporation, hereby certify that I served a true and correct copy of the foregoing Response to Notice of Final Cure Payment, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: 11/22/23

Ashley Irene Small 129 Clearview Road Aspers, Pennsylvania 17304 Gary J Imblum Imblum Law Offices, P.C. 4615 Derry Street Harrisburg, Pennsylvania 17111 Attorney for Debtors

United States Trustee US Courthouse 1501 N. 6th St Harrisburg, Pennsylvania 17102 Jack N Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, Pennsylvania 17036 Trustee

Desc

/s/ Andrew M. Lubin

MARISA MYERS COHEN, ESQUIRE ID #87830 ANDREW M. LUBIN, ESQUIRE ID # 54297 Attorney for Freedom Mortgage Corporation 1420 Walnut Street, Suite 1501 Philadelphia, PA 19102 Telephone: (215) 790-1010

Facsimile: (215) 790-1274
Email: ecfmail@mwc-law.com

Loan #: BK Case #: Name: BK Filed	Small 5/13/2019													
Date Received	Contractual Due Date	Post Petition Due Date	Pre	Payment Amount	Amount Due	Difference	Post Suspense	Pre Suspense	Fees	Contractual from Pre	Comments Balance at Filing	Principal	Interest	Principal Balance
6/7/2019 7/9/2019 8/13/2019		6/1/2019 7/1/2019		\$ 1,618.36 \$ 1,819.09 \$ 1,665.65	\$ 1,665.65 \$ 1,665.65	\$ 1,618.36 \$ 153.44 \$ -	\$ 1,618.36 \$ 1,771.80 \$ 1,771.80	\$ -						\$ - \$ - \$ -
9/30/2019 10/1/2019		8/1/2019	\$ 705.14	\$ 1,735.65	\$ 1,665.65	\$ 70.00 \$ -	\$ 1,841.80 \$ 1,841.80	\$ - \$ 705.14						\$ - \$ -
10/1/2019 11/1/2019 11/12/2019		9/1/2019 10/1/2019	\$ 606.19	\$ 2,170.32 \$ 1,735.65	\$ 1,665.65 \$ 1,665.65		\$ 2,346.47 \$ 2,416.47 \$ 2,416.47	\$ 705.14 \$ 705.14 \$ 415.82		\$ 895.51	PMT			\$ - \$ - \$ -
11/12/2019 12/7/2019		11/1/2019 12/1/2019		\$ 1,735.65	\$ 1,665.65 \$ 1,585.89	\$ (1,665.65) \$ 149.76	\$ 750.82 \$ 900.58	\$ 415.82 \$ 415.82						\$ - \$ -
12/18/2019 1/15/2020 1/23/2020		1/1/2020	\$ 606.19 \$ 606.13	\$ 1,655.89	\$ 1,585.89	\$ - \$ 70.00 \$ -	\$ 900.58 \$ 970.58 \$ 970.58	\$ 126.50 \$ 126.50 \$ 732.63		\$ 895.51	PMT			\$ - \$ - \$ -
2/8/2020 2/19/2020		2/1/2020	\$ 606.17	, , , , , , , , , , , , , , , , , , , ,	\$ 1,585.89	\$ 70.00 \$ -	\$ 1,040.58 \$ 1,040.58	\$ 732.63 \$ 443.29		\$ 895.51	PMT			\$ - \$ -
3/11/2020 3/24/2020 4/9/2020		3/1/2020 4/1/2020	\$ 606.18	. ,	\$ 1,585.89 \$ 1,585.89	\$ 70.00 \$ - \$ 70.00	\$ 1,110.58 \$ 1,110.58 \$ 1,180.58	\$ 443.29 \$ 153.96 \$ 153.96		\$ 895.51	PMT			\$ - \$ - \$ -
4/27/2020 5/9/2020		5/1/2020	\$ 606.17	\$ 1,655.89	\$ 1,585.89	\$ - \$ 70.00 \$ -	\$ 1,180.58 \$ 1,250.58	\$ 760.13 \$ 760.13		¢ 005.54	DMT			\$ - \$ -
5/13/2020 5/20/2020 6/11/2020		6/1/2020	\$ 584.73 \$ 584.74	\$ 1,585.89	\$ 1,585.89	Ŧ	\$ 1,250.58 \$ 1,250.58 \$ 1,250.58	\$ 449.35 \$ 449.35 \$ 138.58		\$ 895.51 \$ 895.51	PMT PMT			\$ -
7/9/2020 7/21/2020		7/1/2020	\$ 584.73	\$ 1,655.89	\$ 1,585.89	\$ 70.00 \$ -	\$ 1,320.58 \$ 1,320.58	\$ 138.58 \$ 723.31						
7/21/2020 8/7/2020 9/11/2020		8/1/2020 9/1/2020			\$ 1,585.89 \$ 1,585.89		\$ 1,320.58 \$ 1,390.58 \$ 1,460.58	\$ 723.31						
9/23/2020 10/16/2020		10/1/2020	\$ 584.73		\$ 1,585.89	\$ - \$ 70.00	\$ 1,460.58 \$ 1,530.58	\$ 412.53 \$ 412.53		\$ 895.51	PMT			
10/22/2020 11/19/2020 12/30/2020		11/1/2020 12/1/2020	\$ 584.74		\$ 1,585.89 \$ 1,678.16		\$ 1,530.58 \$ 1,600.58 \$ 1,578.31	\$ 101.76		\$ 895.51	PMT			
1/28/2021 1/28/2021		12/1/2020	\$ 2,501.36	Ψ 1,000.00	Ψ 1,070.10	\$ - \$ -	\$ 1,578.31 \$ 1,578.31	\$ 1,707.61		\$ 895.51 \$ 895.51	PMT PMT			
2/8/2021 2/23/2021 3/9/2021		2/1/2021	\$ 454.79		\$ 1,678.16 \$ 1,678.16	\$ -	\$ 1,648.31 \$ 1,648.31 \$ 1,718.31	•		\$ 895.51	PMT			
3/23/2021 3/23/2021 3/29/2021		3/1/2021	\$ 591.23		\$ 1,678.16	\$ 70.00	\$ 1,788.31 \$ 1,788.31	\$ 371.38		\$ 895.51	PMT			
5/4/2021 5/25/2021		4/1/2021 5/1/2021	Φ 055.50	·	\$ 1,678.16 \$ 1,678.16	\$ 70.00	Ψ .,σ=σ.σ.	\$ 67.10						
6/28/2021 7/13/2021 7/29/2021		6/1/2021 7/1/2021	\$ 855.56		\$ 1,678.16 \$ 1,678.16		\$ 1,928.31 \$ 1,998.31 \$ 2,068.31	\$ 922.66 \$ 922.66 \$ 922.66						
8/19/2021 8/26/2021		8/1/2021	\$ 610.72		\$ 1,678.16	\$ 70.00 \$ -	\$ 2,138.31 \$ 2,138.31	\$ 922.66 \$ 1,533.38						
9/21/2021 9/24/2021 10/28/2021		9/1/2021	\$ 610.72		\$ 1,678.16 \$ 1,678.16		\$ 2,138.31 \$ 2,208.31 \$ 2,278.31	\$ 2,144.10						
11/22/2021 11/26/2021		11/1/2021	\$ 1,186.36		\$ 1,678.16	\$ - \$ 70.00	\$ 2,278.31 \$ 2,348.31	\$ 3,330.46 \$ 3,330.46						
11/26/2021 12/27/2021 12/31/2021		12/1/2021	\$ 593.18	\$ 1,800,00	\$ 1,545.80 \$ 1,545.80	\$ -		\$ 3,330.46 \$ 3,923.64 \$ 3,923.64						
12/31/2021 1/28/2022		2/1/2022			\$ 1,545.80	\$ -	\$ 1,056.71 \$ 1,126.61	\$ 3,923.64 \$ 3,923.64						
2/8/2022 3/7/2022 3/7/2022		3/1/2022	\$ 593.18	\$ 1,850.00	\$ 1,545.80	\$ - \$ 304.20 \$ -	\$ 1,126.61 \$ 1,430.81 \$ 1,430.81	\$ 4,516.82						
3/30/2022 3/30/2022		4/1/2022 5/1/2022		\$ 2,005.39	\$ 1,545.80 \$ 1,545.80	\$ 459.59 \$ (1,545.80)	\$ 1,890.40 \$ 344.60	\$ 4,516.82 \$ 4,516.82						
4/5/2022 4/8/2022		6/1/2022	\$ 1,204.61		\$ 1,545.80	\$ 389.69	\$ 734.29	\$ 5,721.43 \$ 5,721.43						
5/24/2022 5/25/2022 6/17/2022		7/1/2022 8/1/2022	\$ 1,186.36		\$ 1,545.80 \$ 1,545.80	\$ -	\$ 819.78			\$ 6,828.73	Escrow			+
7/30/2022 8/9/2022		9/1/2022	\$ 593.18	\$ 1,615.80	\$ 1,545.80	\$ -	\$ 516.17	\$ 672.24						
9/7/2022 9/13/2022 9/29/2022		10/1/2022	\$ 637.36	\$ 1,140.62	\$ 1,545.80	\$ - \$ (405.18) \$ -	\$ 110.99	\$ 1,309.60 \$ 1,309.60 \$ 2,584.32						
9/29/2022 9/29/2022				<b>*</b> 4.440.00		\$ - \$ -	\$ 110.99	\$ 2,584.32 \$ 2,584.32						
10/13/2022 10/25/2022 10/25/2022			\$ 604.22	\$ 1,140.62		\$ 1,140.62 \$ - \$ -	\$ 1,251.61 \$ 1,251.61 \$ 1,251.61	\$ 102.40		\$ 3,086.14	Escrow			
10/28/2022 11/16/2022		11/1/2022 12/1/2022	<b>COA OO</b>		\$ 1,545.80 \$ 1,558.59	\$ (12.79)	\$ 1,349.20 \$ 1,336.41	\$ 102.40						
12/21/2022 12/21/2022 12/21/2022			\$ 604.23			\$ - \$ -	\$ 1,336.41 \$ 1,336.41 \$ 1,336.41							
1/4/2023 1/17/2023		1/1/2023 2/1/2023	Ф 4 000 4F		\$ 1,558.59 \$ 1,558.59		\$ 1,406.41 \$ 1,463.62	\$ 706.63	ф. 050 40		10			
1/25/2023 1/25/2023 1/25/2023			\$ 1,208.45			\$ - \$ -	\$ 1,463.62 \$ 1,463.62 \$ 1,463.62	\$ 1,258.65	\$ 656.43		LC			
1/25/2023 1/25/2023						\$ - \$ -	\$ 1,463.62 \$ 1,463.62	\$ 1,258.65 \$ 1,258.65						
1/25/2023 1/25/2023 1/25/2023						\$ - \$ -	\$ 1,463.62 \$ 1,463.62 \$ 1,463.62	\$ 1,258.65						
2/23/2023 3/1/2023		3/1/2023	\$ 604.22	\$ 1,558.59	\$ 1,558.59	\$ -	\$ 1,463.62 \$ 1,463.62	\$ 1,862.87 \$ 1,862.87						
3/22/2023 4/11/2023 4/25/2023		4/1/2023	\$ 604.22 \$ 604.23	\$ 1,558.59	\$ 1,558.59	\$ - \$ -	\$ 1,463.62 \$ 1,463.62 \$ 1,463.62	\$ 2,467.09						
5/15/2023 5/19/2023		5/1/2023		\$ 1,558.59	\$ 1,558.59	\$ -	\$ 1,463.62 \$ 1,463.62	\$ 3,071.32 \$ 3,071.32						
5/19/2023 5/19/2023 5/19/2023						\$ - \$ - \$ -	\$ 1,463.62 \$ 1,463.62 \$ 1,463.62	\$ 3,071.32						
5/19/2023 5/19/2023				\$ 94.94		\$ 94.94 \$ -	\$ 1,558.56 \$ 1,558.56	\$ 3,071.32 \$ 3,071.32			Admin Adjustment			
6/23/2023 7/25/2023 9/11/2023		6/1/2023	\$ 604.22 \$ 269.08	\$ 1,558.59	\$ 1,558.59	\$ - \$ -	\$ 1,558.56 \$ 1,558.56 \$ 1,558.56	\$ -	\$ 3,944.62		Fees/Costs			
10/17/2023 10/20/2023		7/1/2023		\$ 70.49 \$ 3,120.00	\$ 1,558.59	\$ 70.49 \$ 1,561.41	\$ 1,629.05 \$ 3,190.46	\$ - \$ -						
10/20/2023 10/20/2023 11/10/2023		8/1/2023 9/1/2023 10/1/2023			\$ 1,558.59 \$ 1,558.59 \$ 1,558.59	\$ (1,558.59)	\$ 3,191.87 \$ 1,633.28 \$ 1,703.28	\$ -						
11/10/2023		11/1/2023		ψ 1,020.09		\$ (1,558.59)								1